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9 **BEFORE THE**
BOARD OF REGISTERED NURSING
10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11 In the Matter of the Accusation Against:

12 **FELIX BROWN**
13 223 West 52nd Place
Los Angeles, California 90037

14 Registered Nurse License No. 292969

15 Respondent.
16
17

Case No.

2010-226

A C C U S A T I O N

18 Louise R. Bailey, M.Ed., RN ("Complainant") alleges:

19 **PARTIES**

20 1. Complainant brings this Accusation solely in her official capacity as the Interim
21 Executive Officer of the Board of Registered Nursing ("Board"), Department of Consumer
22 Affairs.

23 2. On or about August 31, 1978, the Board issued Registered Nurse License Number
24 292969 to Felix Brown ("Respondent"). The license was in full force and effect at all times
25 relevant to the charges brought herein. The license expired on February 28, 2006, and has not
26 been renewed.

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1 **CAUSE FOR DISCIPLINE**

2 **(Gross Negligence)**

3 11. Respondent is subject to discipline under Code section 2761, subdivision (a)(1),
4 as defined under California Code of Regulations, title 16, section 1442, in that on or about
5 March 24, 2005, while on duty as a Charge Nurse in the CCU at King/Drew, Respondent was
6 grossly negligent by allowing Andrade to take an unauthorized break, allowing Andrade to sleep
7 on duty on prior occasions, and leaving the unit inadequately staffed and supervised.
8 Complainant refers to and incorporates all the allegations contained in paragraphs 8 - 10, as
9 though set forth fully.

10 **PRAYER**


11 **WHEREFORE**, Complainant requests that a hearing be held on the matters herein
12 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

13 1. Revoking or suspending Registered Nurse License Number 292969, issued to
14 Felix Brown;

15 2. Ordering Felix Brown to pay the Board of Registered Nursing the reasonable
16 costs of the investigation and enforcement of this case, pursuant to Business and Professions
17 Code section 125.3; and,

18 3. Taking such other and further action as deemed necessary and proper.

19 DATED: 10/22/09

20 
21 LOUISE R. BAILEY, M.Ed., RN
22 Interim Executive Officer
23 Board of Registered Nursing
24 Department of Consumer Affairs
25 State of California
26 Complainant

27 LA2009602300

28 Accusation.(kdg)7/21/09